

**UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NETLIST, INC.,

Plaintiff,

VS.

MICRON TECHNOLOGY, INC.,  
MICRON SEMICONDUCTOR  
PRODUCTS, INC., AND MICRON  
TECHNOLOGY TEXAS LLC,

Defendants.

Case No. 2:22-CV-203-JRG-RSP

JURY TRIAL DEMANDED

Filed Under Seal

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST'S  
MOTION TO STRIKE DEFENDANTS' SEPTEMBER 14, 2023  
SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1**

**I, Jason G. Sheasby, declare as follows:**

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Motion to Strike Defendants’ September 1, 2023 Supplemental Response to Interrogatory No. 1. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of Micron’s Fourth Supplemental Response to Netlist First Set of Interrogatories.

3. Attached as **Exhibit 2** is a true and correct copy of Netlist’s First Set of Interrogatories.

4. Attached as **Exhibit 3** is a true and correct copy of Netlist’s First 30(b)(6) Notice of Deposition of Defendants.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the deposition transcript of Monolithic Power Systems’ corporate representative, dated August 10, 2023.

6. Attached as **Exhibit 5** is a true and correct excerpted copy the deposition transcript of Richtek USA’s corporate representative, dated September 1, 2023.

7. Attached as **Exhibit 6** is a true and correct copy of the deposition transcript of Mr. Neal Koyle, dated September 18, 2023.

8. Attached as **Exhibit 7** is a true and correct copy of a document titled “Micron DDR5: Key Module Features.”

9. Attached as **Exhibit 8** is a true and correct copy of email correspondence between counsel for Netlist and counsel for Texas Instruments (TI), between July 11, 2023 and

September 19, 2023.

10. Attached as **Exhibit 9** is a true and correct copy of email correspondence between counsel for Netlist and counsel for Texas Instruments (TI), between December 7, 2022 and May 8, 2023.

11. Attached as **Exhibit 10** is a true and correct copy of email correspondence between counsel for Netlist and counsel for Texas Instruments (TI), between May 15, 2023 and June 30, 2023.

12. Attached as **Exhibit 11** is a true and correct copy of a letter from counsel for Netlist to counsel for Micron, dated November 10, 2022.

13. Attached as **Exhibit 12** is a true and correct copy of correspondence from counsel for Netlist to counsel for Micron, between January 23, 2023 and March 24, 2023.

14. Attached as **Exhibit 13** is a true and correct copy of an email correspondence between counsel for Netlist and counsel for Micron from July 31, 2023 to September 13, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on September 20, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby  
Jason G. Sheasby